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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER  
EXTENDING TIME TO SUBMIT A JOINT  
OR COMPETING ESI PROTOCOL**

This Document Relates to:

ALL ACTIONS

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

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**STIPULATION**

**WHEREAS**, on December 28, 2023, the Court issued an order regarding discovery and initial motions. Pretrial Order No. 5, Dkt. No. 175;

**WHEREAS**, the Court ordered Plaintiffs' Co-Lead Counsel and the PSC to meet and confer with Uber regarding, among other things, the ESI protocols that will be followed in this case. Pretrial Order No. 5, Dkt. No. 175 at 6. The Court further ordered the parties to submit a joint or competing ESI Protocol by February 4, 2024. *Id.*; and

**WHEREAS**, the Plaintiffs have provided a draft ESI Protocol to Defendants, Defendants have provided revisions to Plaintiffs' draft ESI protocol, and the parties have met and conferred to discuss the issues in dispute, and agree that extending the deadline to submit a joint or competing ESI Protocol to February 12, 2024, will facilitate the efficient resolution of those disputes and conserve judicial resources;

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

By February 12, 2024, the parties shall submit a joint or competing ESI Protocol. If the parties submit competing ESI Protocols, each shall submit its own proposed order regarding production of ESI with a memorandum (not to exceed 15 pages) explaining why the Court should adopt that party's proposal.

**IT IS SO STIPULATED.**

Dated: February 2, 2024

**PAUL, WEISS, RIFKIND, WHARTON &  
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By: /s/ Randall S. Luskey

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1 Dated: February 2, 2024

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**FILER'S ATTESTATION**

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: February 2, 2024

By: /s/ Randall S. Luskey  
Randall S. Luskey

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
 PASSENGER SEXUAL ASSAULT  
 LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER GRANTING  
 STIPULATION EXTENDING TIME  
 TO SUBMIT A JOINT OR COMPETING  
 ESI PROTOCOL**

This Document Relates to:  
 ALL ACTIONS

The Court hereby GRANTS the parties' stipulation as follows:

By February 12, 2024, the parties shall submit a joint or competing ESI Protocol. If the parties submit competing ESI Protocols, each shall submit its own proposed order regarding production of ESI with a memorandum (not to exceed 15 pages) explaining why the Court should adopt that party's proposal.

**IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2024

\_\_\_\_\_  
 HON. LISA J. CISNEROS  
 UNITED STATES MAGISTRATE JUDGE